

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WEBSOCK GLOBAL STRATEGIES LLC,

Plaintiff,

v.

AKAMAI TECHNOLOGIES, INC.,

Defendant.

Civil Action No.: 6:24-cv-00256-DAE

JURY TRIAL DEMANDED

DECLARATION OF TODD LAWRENCE

I, Todd Lawrence, declare as follows:

1. I have personal knowledge of the facts set forth in this declaration and, if called to testify as a witness, could and would do so under oath.

2. I am Vice President, Network Infrastructure at Akamai Technologies, Inc., and I currently work at Akamai's headquarters located at 145 Broadway, Cambridge, MA 02142.

3. Akamai was founded in 1998 and is a leader in content delivery network (CDN) technology. Akamai's CDN technology allows its customers' end-users to obtain Internet content such as applications and web pages faster and more securely. Akamai has independently developed some of the most cutting-edge Internet content delivery technology in the world. Akamai holds more than 450 of its own patents. Akamai sells and provides its services throughout the United States and abroad.

4. Akamai is headquartered in Cambridge, Massachusetts, and incorporated in the State of Delaware. Akamai has significant operations in Massachusetts, conducts research and development in Massachusetts, and employs more than 1,800 people at offices in Cambridge, Massachusetts.

5. By virtue of my position in Akamai's Infrastructure Engineering and Operations division, I am familiar with Akamai's operations in or related to various geographic areas of the United States, including the Western District of Texas, which I am informed includes the following Texas counties: Andrews, Atascosa, Bandera, Bastrop, Bell, Bexar, Blanco, Bosque, Brewster, Burleson, Burnet, Caldwell, Comal, Coryell, Crane, Culberson, Dimmit, Ector, Edwards, El Paso, Falls, Freestone, Frio, Gillespie, Gonzales, Guadalupe, Hamilton, Hays, Hill, Hudspeth, Jeff Davis, Karnes, Kendall, Kerr, Kimble, Kinney, Lampasas, Lee, Leon, Limestone, Llano, Loving, Martin, Mason, Maverick, McCulloch, McLennan, Medina, Midland, Milam, Pecos, Presidio, Real, Reeves, Robertson, San Saba, Somervell, Terrell, Travis, Upton, Uvalde, Val Verde, Ward, Washington, Williamson, Wilson, Winkler, and Zavala.

6. Akamai does not own or lease any offices, factories, facilities, or properties in the Western District of Texas. Akamai does not advertise any places of business in the Western District of Texas. The Akamai web page showing Akamai locations (<https://www.akamai.com/company/locations>) does not include any location in the Western District of Texas. A true and correct copy of the web page is attached to this declaration as Exhibit 1.

7. I understand that the plaintiff alleges in its complaint that Akamai has a place of business at 6836 Austin Center Boulevard 165, Austin, TX 78731. That is not correct. Akamai has never owned or leased any space at 6836 Austin Center Boulevard 165, Austin, Texas 78731, and does not currently own or lease any space at that location.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on June 5, 2024 in NEEDHAM, Massachusetts.

A handwritten signature in black ink, appearing to read 'Todd Lawrence', is written over a horizontal line.

Todd Lawrence